

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JOSEPH A. DAOU and KAREN M. DAOU,	:	
	:	
Plaintiffs,	:	
	:	
- against -	:	1:20-cv-04438-DLC
	:	
BLC BANK, S.A.L., CREDIT LIBANAIS,	:	
S.A.L., AL-MAWARID BANK, S.A.L., and	:	
BANQUE DU LIBAN,	:	
	:	
Defendants.	:	
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NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the First Amended Complaint filed in this action; the accompanying Memorandum of Law in Support of Defendant Banque du Liban’s Motion to Dismiss the First Amended Complaint; the Declaration of Fadi Moghaizel, together with the exhibits attached thereto; the Declaration of Naaman Naddour, together with the exhibits attached thereto; all prior pleadings and filings in this action, including without limitation the motions to dismiss filed by Defendants BLC Bank, S.A.L., Credit Libanais, S.A.L., and Al-Mawarid Bank, S.A.L.; and such other and further matters as may be presented at the hearing on this Motion or prior to the Court’s decision thereon, Defendant Banque du Liban (the “Central Bank”) will move this Court, before the Honorable Denise L. Cote, United States District Judge of the United States District Court, Southern District of New York, at 500 Pearl St., New York, New York 10007, on a date and at a time designated by the Court, for an Order pursuant to Rules 12(b)(1), 12(b)(2), and 12(b)(6) of the Federal Rules of Civil Procedure, and pursuant to the doctrine of *forum non conveniens*, dismissing the First Amended Complaint as against the Central Bank and for such other and further relief as the Court deems necessary and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's Order of November 17, 2020, and unless otherwise agreed, papers in opposition to this Motion shall be due on or before January 8, 2021, and reply papers shall be due on or before January 29, 2021.

Dated: New York, New York
December 1, 2020

DECHERT LLP

By: /s/ Linda C. Goldstein

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